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CITY OF SNOHOMISH

Founded 1859, Incorporated 1890

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TransmittalBy: ☒ Fax Total Pages 2
202 565-9000
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DATE: July 28, 2004

TO: STB—Environmental

FROM: Ann Caley, City of Snohomish

RE: Environmental Assessment on AB-6 (Sub-no. 422X)

MEMO:

For Your Use
Please Review and Respond
For Your Approval
As Discussed on the Phone
As Requested

By:

Ann Caley
Project Manager

cc: John A. Sims



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VIA FAX

Memorandum

Date: July 28, 2004

To: STB-Section on Environmental Analysis

From: City of Snohomish

Larry Bauman, City Manager

Re: Environmental Assessment on AB-6 (Sub-no. 422X)

The bridge discussed in the EA in this proceeding is in and adjacent to the City of Snohomish, including City facilities. The bridge contains support piers within the river bed which may require removal. Such removal should be undertaken only subject to a Washington State Department of Wildlife Hydraulic Project Approval and possibly a Corps of Engineers permit. The EA should be amended to recommend that BNSF consult and obtain such permits if removal of the piers is undertaken as an incident to salvage.

In addition, BNSF should be required to consult with the County for a demolition permit and a shoreline permit may also be required. In the event BNSF undertakes removal of the bridge as an incident to salvage, BNSF should be required to consult to determine whether such permits are necessary. This is especially important as the bridge possibly contains lead paint, and may contain other toxic material (e.g., pcb's in machinery associated with the bridge).

Finally, the EA fails to note that the following endangered species inhabit the Snohomish River in the vicinity of the bridge: Chinook salmon and bull trout. Salvage operations should not be undertaken which adversely affect these listed species, and any removal of the bridge should be so conditioned. The reports in Appendices D and E from Washington State Department of Natural Resources and Department of Wildlife were generated in 2001, prior to the listing of Chinook salmon and bull trout on the Federal Endangered Species List. The project is within one mile of bald eagle nesting sites, also a federally-endangered species. There may be additional species that have been added to state and federal lists since 2001, and the EA should be amended to include updates by the respective agencies.

If you have any questions, please do not hesitate to call Ann Caley, at (360) 568-3115.

I certify that a copy of this comment was also faxed to BNSF's counsel BNSF Law (att: John A. Sims) at 817-352-2397.

CC: Vernon Williams, Secretary STB
John A. Sims, BNSF Counsel
C. Montange